

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -

5
6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :
13

14 - HIGHLY CONFIDENTIAL -

15 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

16 VOLUME II
17 - - -

18 April 18, 2019
19 - - -

20 Continued videotaped
21 deposition of THOMAS PREVOZNIK, taken
22 pursuant to notice, was held at the law
23 offices of Williams & Connolly, 725 12th
24 Street, Washington, D.C., beginning at
 8:16 a.m., on the above date, before
 Michelle L. Gray, a Registered
 Professional Reporter, Certified
 Shorthand Reporter, Certified Realtime
 Reporter, and Notary Public.

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25 GOLKOW LITIGATION SERVICES
26 877.370.3377 ph | 917.591.5672 fax
27 deps@golkow.com
28

1 terminate controlled substance sales to
2 the customer and report the termination
3 to the DEA."

4 Do you understand what I
5 just read to you?

6 MS. MAINIGI: Objection.

7 Form. Objection. Scope.

8 THE WITNESS: Can I get the
9 first -- the first part of the
10 question?

11 BY MR. FARRELL:

12 Q. Yes. So specifically what
13 I'm referencing is Cardinal Health's
14 reply brief, in Cardinal Health versus
15 Eric Holder, which was a preliminary
16 injunction filed by Cardinal Health in a
17 DC District Court. And in it -- in the
18 reply brief there's a provision in here
19 that I read to you. And in essence what
20 it says is that if you get a suspicious
21 order, and you block it, that Cardinal
22 Health would terminate that customer and
23 not sell to it anymore.

24 Do you agree that if a

1 wholesale distributor gets a flag of a
2 suspicious order, that they've determined
3 to be a suspicious order, and that they
4 block that shipment, that they should
5 terminate all future sales to that same
6 customer until they can rule out that
7 diversion is occurring?

8 MS. MAINIGI: Objection.

9 Form. Objection. Scope. Calls
10 for a hypothetical.

11 MR. EPPICH: Objection to
12 the foundation. Calls for
13 speculation.

14 THE WITNESS: Yes, I would
15 agree.

16 BY MR. FARRELL:

17 Q. The same thing applies to a
18 document involving McKesson.

19 On August 13, 2014, the
20 United States Department of Justice was
21 communicating with the lawyer for
22 McKesson which ended up resulting in a
23 \$150 million fine.

24 And in this discussion, the